

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

COREY HARDIN, DAVID MUHAMMAD, and  
CHASE WILLIAMS, individually and on behalf  
of all others similarly situated,

Plaintiffs,

v.

TRON FOUNDATION, JUSTIN SUN, and  
ZHIQIANG (LUCIEN) CHEN,

Defendants.

Case No. 1:20-cv-02804-VSB

Honorable Vernon S. Broderick

**CORPORATE DISCLOSURE STATEMENT OF TRON FOUNDATION**

TRON Foundation (“TRON”) hereby discloses pursuant to Federal Rule of Civil Procedure 7.1 that it has no parent corporation and no publicly held corporation owns 10% or more of TRON’s stock.

Dated: November 23, 2020

Respectfully submitted,

FENWICK & WEST LLP

By: /s/ Dean S. Kristy

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TRON FOUNDATION and JUSTIN SUN

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and correct copy of the foregoing was served on Defendant Zhiqiang (Lucien) Chen by email to zhiqiang\_chen1@126.com and feedback@volumenetwork.io on November 23, 2020.

I further certify that a true and correct copy of the foregoing was served via the CM/ECF system on the individuals listed below on November 23, 2020:

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